

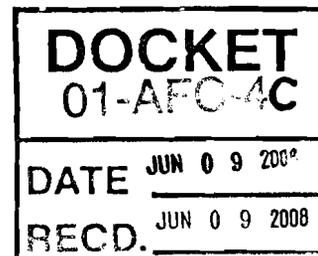
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June 9, 2008



Ms. Donna Stone
California Energy Commission
1516 Ninth Street, MS-2000
Sacramento, CA 95814

Subject: East Altamont Energy Center – 01-AFC-4C
Petition for Extension of the Deadline for Commencement of Construction

Dear Ms. Stone:

On May 16, 2008, we submitted a Petition for Extension of the Deadline for Commencement of Construction for the East Altamont Energy Center.

At your request, we provide the following additional information and clarification regarding the interconnection studies for the East Altamont Energy Center.

As noted in the Commission's Final Decision approving the East Altamont Energy Center, a System Impact Study and a Detailed Facilities Interconnection Study were prepared by the Western Area Power Authority (the transmission system owner) with review and input from other affected utilities and agencies. (EAEC Final Decision, p. 87) The Final Decision discussed the possibility that the Detailed Facilities Interconnection Study might be modified prior to the commencement of construction. The potential modification of the Detailed Facilities Interconnection Study is expressly mentioned in Condition TSE-1, Subsection 8(i), as set forth in the Final Decision. (EAEC Final Decision, p. 91)

Given the passage of time since the System Impact Study and Detailed Facilities Impact Study were performed, we recognize that the transmission system owner may require that the System Impact Study and/or the Detailed Facilities Interconnection Study be updated prior to commencement of construction. In order to ensure that any updated interconnection studies required by the transmission system owner are prepared and submitted to the Commission in a timely manner prior to construction, the Project Owner proposes that (as a condition of the extension of the deadline to commence construction) the following language be added to Condition of Certification TSE-1:¹

¹ Proposed text to be added is underlined.

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“TSE-1 The project owner shall ensure that the design, construction and operation of the proposed transmission facilities shall conform to all applicable LORS including the requirements 1 through 8 listed below. The substitution of Compliance project manager (CPM) approved “equivalent” equipment and an equivalent substation configuration is acceptable.

1. The project 230 kV switchyard shall have switch bays with a double bus, and a breaker and a half configuration.
2. The power plant switchyard and outlet lines shall meet or exceed the electrical, mechanical, civil and structural requirements of Western interconnection standards, Western’s DFIS, CPUC General Orders 95 (GO-95) or National Electric Safety Code (NESC), Title 8 of the California Code and Regulations, Articles 35, 36 and 37 of the “High Voltage Electric Safety Orders”, National Electric Code (NEC) and related industry standards.
3. Breakers and buses in the power plant switchyard and other switchyards, where applicable, shall be sized to comply with a short-circuit analysis.
4. Outlet line crossings and line parallels with transmission and distribution facilities shall be coordinated with the transmission line owner and comply with the owner’s standards.
5. Termination facilities shall comply with applicable Western interconnection standards.
6. The project conductors shall be sized to accommodate the full output from the project.
7. The existing Tracy-Westley 230 kV double circuit line shall be split into two lines and terminated on two separate breakers at the Tracy and Westley substations with interconnection of the EAEC plant switchyard to the two lines. The existing Tracy 230 kV bays 1 to 12 shall be converted from main and transfer to a double bus -double breaker configuration.
8. The project owner shall provide:
 - i) Any new or modified System Impact Study, if required by the transmission system operator,
 - ii) Any modified Detailed Facility Interconnection Study (DFIS) including a description of facility upgrades, operational mitigation measures, and/or Remedial Action Scheme (RAS) or Special Protection System (SPS) sequencing and timing if applicable,
 - iii) An executed Facility Interconnection Agreement with Western. 6/03/03 RT 32:2-37:24.)
 - iii) A copy of the Notice to Cal-ISO prior to synchronization of the facility with the California transmission grid, and
 - iv) A letter stating that the mitigation measures or projects for each criteria violation selected by Western, PG&E, SMUD and MID are acceptable.

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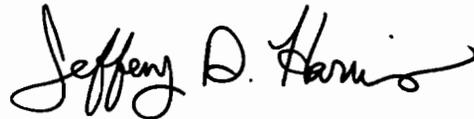
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Verification: At least sixty (60) days prior to the start of grading of the power plant switchyard or transmission facilities, the project owner shall submit to the CPM for approval:

Electrical one line diagrams signed and sealed by a registered professional electrical engineer in responsible charge (or other approval acceptable to the CPM), a route map, and an engineering description of equipment and the configurations covered by the requirements 1a) through 1h) above.

The System Impact Study (if modified) and the Detailed Facilities Study (if modified) including a description of facility upgrades, operational mitigation measures and/or RAS or SPS, and the Interconnection Agreement (if either one are not otherwise provided to the Commission previously) and a signed letter from the project owner stating that the mitigation measures selected by Western, PG&E, SMUD and MID are acceptable. Substitution of equipment and substation configurations shall be identified and justified by the project owner for CPM approval.”

Sincerely,

A handwritten signature in black ink that reads "Jeffery D. Harris". The signature is written in a cursive style with a long, sweeping tail on the letter "s".

Greggory L. Wheatland
Jeffery D. Harris
Attorneys for East Altamont Energy Center, LLC

GLW/kam